

REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

At the outset, Applicants note with appreciation the opportunity for Applicants' representative to discuss the present application with Examiners Duy Le and Pablo Tran in a personal interview, which was conducted on February 3, 2004.

Claims 1-14 are presently active. Claims 1-12 are amended, and Claims 13 and 14 are added, by the present amendment. Among other changes, Claims 1-12 are amended to better conform to standard U.S. practice. For example, all parenthetical numerals are deleted from these claims and acronyms are replaced with spelled-out descriptions, where appropriate. All changes to Claims 1-12 are supported by the specification as originally filed, including Figures 1 and 2. Claims 13 and 14 are supported at least by Figure 1 (short message 11) and by Applicants' specification from page 3, line 25, to page 4, line 13. Thus, no new subject matter is introduced by the amendments to Claims 1-12 and by the addition of Claims 13 and 14.

In the Office Action, the drawings were objected to for not having descriptive labels. Independent Claim 1 was rejected under 35 U.S.C. § 102(e) as anticipated by Donovan et al. (U.S. Patent No. 6,075,982; hereinafter "Donovan"). Claims 2-3 were rejected under 35 U.S.C. § 103(a) as unpatentable over Donovan in view of Walker (U.S. Patent No. 5,825,863) and further in view of Kasai et al. (U.S. Patent No 5,815,560; hereinafter "Kasai"). Claim 4 was rejected under 35 U.S.C. § 103(a) as unpatentable over Donovan in view of Walker in view of Kasai and further in view of Alvesalo (U.S. Patent No. 5,384,824). Claim 5 was rejected under 35 U.S.C. § 103(a) as unpatentable over Donovan in view of Walker. Claim 6 was rejected under 35 U.S.C. § 103(a) as unpatentable over Donovan in view of Joensuu et al. (U.S. Patent No. 5,966,653; hereinafter "Joensuu").

Independent Claim 7 and Claims 9 and 11 were rejected under 35 U.S.C. § 103(a) as unpatentable over Donovan in view of Kasai. Claim 8 was rejected under 35 U.S.C. § 103(a) as unpatentable over Donovan in view of Kasai and further in view of Sjodin (U.S. Patent No. 6,631,140). Claim 10 was rejected under 35 U.S.C. § 103(a) as unpatentable over Donovan in view of Kasai and further in view of Joensuu. Claim 12 was rejected under 35 U.S.C. § 103(a) as unpatentable over Donovan in view of Kasai in view of Sjodin and further in view of Joensuu.

Regarding the specification, the foregoing amendment adds application headings where appropriate and corrects a typographical error originally contained in the paragraph beginning at specification page 4, line 23. No new subject matter is introduced by these changes.

Regarding the objection to the drawings, Applicants herewith submit revised Figures 1 and 2, which include descriptive labels for all of the illustrated system elements. Accordingly, Applicants respectfully request reconsideration and withdrawal of the objection to the drawings.

Regarding the rejection of independent Claim 1, Applicants respectfully submit that Donovan fails to teach each and every feature of amended Claim 1. Amended Claim 1 recites, among other features:

...sending a short message including a desired destination number from the mobile device to a callback computer; and
establishing a connection by the callback computer between said mobile device of the participant and said desired destination number, wherein:
the establishing step includes calling the mobile device by the callback computer...

With reference to the non-limiting illustration of Applicants' Figure 1, for example, a short message 11 containing a destination number is sent from a mobile device 5 to a callback computer 47 (via intervening sub-systems). The callback computer 47 establishes a

connection between the mobile device 5 and the desired destination number (located within PSTN 8) by calling the mobile device 5 via MSC 6 and MSC 2¹ and by separately calling the destination number via MSC 7 and PSTN 8.² In this way, a caller does not place a call to a destination by simply dialing a destination number and having the call passed through a chain of network elements until the destination is reached. Instead, amended Claim 1 provides for a method in which a caller sends a short message to a callback computer, and the callback computer establishes a connection between the caller's mobile device and a destination number contained in the short message.

Donovan does not teach each and every feature claimed in Claim 1. Donovan is directed to a telecommunications network that includes a wireless enhanced service platform and a prepaid platform.³ Referring to Figure 1 of Donovan, a caller 104 initiates a call to a receiver 122 by entering "calling information (i.e., dials a telephone number) via the wireless handset 106."⁴ In contrast to amended Claim 1, Donovan does not describe sending a short message including a desired destination number. As known to an ordinarily-skilled artisan, the claim term "short message" carries a specific meaning. Specifically, a short message is a text message created and communicated pursuant to, for example, the Short Message Services (SMS) format⁵ or the Unstructured Supplementary Services Data (USSD) format.⁶ Accordingly, amended Claim 1 provides for the sending of a short message including a destination number, whereas Donovan simply describes the dialing of a destination number. Thus, Donovan fails to teach this feature of amended Claim 1.

Further, in accordance with Donovan, a connection is established between the wireless handset 106 and the receiver 122 by routing the call placed by the caller 104 through

¹ Applicants' specification at page 6, lines 16-19.

² *Id.* at page 6, lines 19-24.

³ Donovan at Figure 1 (elements 112 and 116).

⁴ *Id.* at Fig. 3, lines 60-62.

⁵ See, e.g., Applicants' specification at page 1, lines 31-34.

⁶ See, e.g., *Id.* at page 2, lines 5-7, and page 4, lines 6-9.

a series of network elements (e.g., MSC 108, WESP 112, etc.) until the call reaches the receiver 122.⁷ Donovan does not depict a step of establishing a connection by a callback computer between a mobile device and a destination number, in which the callback computer calls the mobile device, as recited in amended Claim 1. Specifically, Donovan is completely silent as to the use of a callback computer to call back a mobile device to establish a connection with a destination number. As such, Donovan fails to teach this feature of amended Claim 1.

For at least the reasons discussed above, Applicants respectfully submit that Donovan fails to teach each and every feature of amended Claim 1. Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of Claim 1 under 35 U.S.C. § 102(e). Claims 2-6 and 13 depend from independent Claim 1 and are patentable over Donovan for at least the reasons discussed above.

Regarding the rejection of independent Claim 7, Applicants respectfully submit that the suggested combination of Donovan and Kasai fails to teach or suggest amended Claim 7. Amended Claim 7 recites, among other features, “a callback computer configured to establish a connection between a participant and a destination number indicated in a short message by at least calling the mobile device.” As discussed above with respect to amended Claim 1, Donovan does not depict the use of a callback computer that calls a mobile device back to establish a connection with a destination number.⁸ For example, the wireless enhanced service platform 112 depicted in Figure 1 of Donovan does not act as a callback computer, as this device does not send a return signal to the handset 106 to establish a connection with the receiver 122.

The Office Action turns to Kasai to remedy the deficiencies of Donovan with respect to amended Claim 7, but Kasai is also silent as to the use of a callback computer which calls

⁷ Donovan at Figure 1.

⁸ Applicants’ specification at page 6, lines 7-19.

an originating mobile device back. Thus, the suggested combination of Donovan and Kasai fails to teach or suggest amended Claim 7.

Accordingly, Applicants respectfully submit that amended Claim 7 is patentable over Donovan and Kasai, and respectfully request reconsideration and withdrawal of the rejection of Claim 7 under 35 U.S.C. § 103(a). Claims 8-12 and 14 depend from Claim 7 and are patentable at least for the reasons discussed above.

Consequently, in light of the above discussion and in view of the present amendment, the present application is believed to be in condition for allowance and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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